

CHAPTER 3

COMPARISON OF IMPACTS AND SIGNIFICANCE LEVELS

INTRODUCTION

A thorough comparison of the environmental impacts of each of the project alternatives was of critical importance to the CPUC. While a detailed analysis of project alternatives is not a legal requirement of an Initial Study, it has been included in this document to provide full disclosure of the potential impacts of the project alternatives. In general terms, the purpose of a CEQA alternatives analysis is to describe a range of reasonable alternatives to the project, or to the project location, that could feasibly attain most of the objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and to evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]). The range of alternatives considered must include those that offer substantial environmental advantages over the proposed project and may be feasibly accomplished in a successful manner considering economic, environmental, social, technological, and legal factors.

The following alternatives were selected for detailed evaluation in this Initial Study:

- Alternative 1 – Islais Creek Alternative
- Alternative 2 – Cargo Way Alternative
- Alternative 3 – Islais Creek Overhead Cable Alternative
- No Project Alternative

The following paragraphs provide a brief summary of each of the alternatives described in Section 1, *Project Description*. A summary of the significance of environmental impacts of the proposed project and the alternatives is provided in **Table 3-1**.

ALTERNATIVE 1 – ISLAIS CREEK ALTERNATIVE

DESCRIPTION

The majority of the 1.8-mile Alternative 1 route is within city streets. Alternative 1 is the shortest and most direct route of all the alternatives, including the proposed project. The Alternative 1 route begins at the northwest corner of the Potrero Switchyard, between 22nd Street and 23rd Street, and runs south along Illinois Street, crossing Cesar Chavez Street, Islais Creek, and Amador Street. The route then follows Cargo Way to Jennings Street, continues along the Hunters Point Power Plant boundary in the Jennings Street right-of-way and terminates at the Hunters Point Switchyard.

This route includes approximately 1,400 feet of existing double-circuit duct bank along Illinois Street from Marin Street to 25th Street and a duct bank under Islais Creek that was constructed by the City's Municipal Railway. However, construction challenges and long-term viability issues make it potentially infeasible and, based upon current information, less desirable than the proposed project route. The issues (as discussed in Section 1.8 of the Project Description) include adequacy of the casing, conduit replacement, Islais Creek crossing and liquefaction concerns, and plans for a railroad crossing over the existing duct bank.

ENVIRONMENTAL IMPACTS

While the impacts and significance levels associated with Alternative 1 would be similar to the proposed project, when compared to the proposed project, temporary or periodic increases in ambient noise levels could potentially be less than under the proposed project. However, Alternative 1 could potentially have a greater impact to the exposure of people or structures to seismic-related ground shaking, ground failure, liquefaction, or landslides compared to the proposed project. The construction challenges and long-term viability issues of the Alternative 1 route make it potentially infeasible and less desirable than the proposed project routes because:

- The existing duct bank installed under Islais Creek may not be viable for transmission line use due to its current condition.
- The existing conduits within the duct bank may not be able to withstand the pressure of the installation of new thermal grout.
- The soils at the Islais Creek crossing are highly unstable and susceptible to liquefaction. In order to withstand this additional loading, the duct banks may need costly foundation rework, including pile driving. The railroad may also limit duct maintenance access during railroad operations.
- The Port of San Francisco plans to construct a railroad over the existing duct bank. Some foundation rework may be necessary to withstand the additional load unless the railroad is constructed in a manner that would not adversely affect the duct bank.

ALTERNATIVE 2 – CARGO WAY ALTERNATIVE

The Alternative 2 route is approximately 2.9 miles in length and follows the same alignment as the proposed project route from the Potrero Switchyard along Illinois Street to 23rd Street. The route then follows Tennessee, 25th, Minnesota, and Cesar Chavez Streets, crossing City-owned and private property to Marin Street, then to Evans Avenue, Quint Street, Cargo Way, Jennings Street, and Evans Street into the Hunters Point Switchyard.

Alternative 2 is longer in length than the proposed project and could potentially be more costly and time-consuming to construct. This alternative could result in potential conflicts with existing utilities and the railroad rights-of-way. Quint Street contains an existing 72-inch underground sewer line, from which the cable would need a minimum separation of 5 feet. There is also an operating railway track along Quint Street, which would likely need to be taken out of operation and removed for a period of three weeks in order to construct the cable. Constructing the cable

beneath or adjacent to the operating railway could also restrict maintenance activities during operations. In addition, special permission to excavate prior to June 2, 2005 would need to be granted due to the current moratorium status on 23rd Street between Third and Tennessee Streets.

ENVIRONMENTAL IMPACTS

While most of the impacts associated with Alternative 2 would be the same as under the proposed project, when compared to the proposed project, the degradation of water quality could potentially be less than under the proposed project. However, Alternative 2 could potentially have a greater impact to potential conflicts with existing underground utilities and construction-related impacts associated with the necessary railroad crossing compared to the proposed project.

Potential existing utilities and railroad conflicts include:

- Quint Street contains an existing 72-inch underground sewer line from which the cable would need a minimum separation of 5 feet.
- The operating railway along Quint Street would likely need to be placed out of operation and removed for a period of three weeks in order to construct the cable, which would likely be installed under the tracks. Constructing the cable under or adjacent to this operating railway could also restrict maintenance activities during operations.
- If construction were scheduled to take place on 23rd Street between Third and Tennessee Streets prior to June 2, 2005, special permission to excavate would need to be granted due to the current moratorium status on these streets.

ALTERNATIVE 3 – ISLAIS CREEK OVERHEAD CABLE ALTERNATIVE

DESCRIPTION

The Alternative 3 route is approximately the same length as the proposed project with the exception of the extensions necessary for the overhead crossing. The Alternative 3 route begins at the northwest corner of the Potrero Switchyard between 22nd and 23rd Streets, and runs south along Illinois Street, crossing Cesar Chavez Street and Marin Street before reaching Islais Creek. The cable line would then leave the underground configuration and rise to an overhead transmission line configuration at the north duct bank of Islais Creek and remain overhead until reaching the south duct bank of the Creek, where it would again transition underground. Two transition stations would be constructed, one on each side of Islais Creek. The line then follows the same underground route as Alternative 1, crossing Amador Street and rising to terminate above ground on the overhead bus/circuit-breaker structure in the Hunters Point Switchyard.

The Alternative 3 route is a shorter, more direct route than the proposed project. However, it has a considerable number of construction challenges, operating constraints, and system reliability issues. These issues include reliability concerns due to multiple transitions between overhead and underground configurations. In addition, transition towers on each side of Islais Creek could create visual concerns and also, permission from the Port of San Francisco would be needed to

construct and install the transition towers. Finally, it may be necessary to close the waterway to shipping traffic during tower construction and installation.

ENVIRONMENTAL IMPACTS

While the impacts and significance levels associated with Alternative 3 would be similar to those of the proposed project, when compared to the proposed project, the degradation of water quality and the temporary or periodic increase in ambient noise levels could potentially be less than under the proposed project. However, Alternative 3 could have a potentially greater impact to the degradation of the existing visual character of the site and surrounding area, the exposure of people or structures to seismic-related ground shaking, ground failure, liquefaction, or landslides compared to the proposed project. This alternative would have construction challenges, operating constraints, and system reliability issues. Because faults exist at the locations of multiple overhead/underground circuits, this alternative would present a substantial system operating challenge.

In addition, under Alternative 3, a new source of light and glare would be created, which would result in a significant and unavoidable impact. This alternative would include above-ground transition towers on each side of Islais Creek, which could include marking/lighting for aviation compliance/regulations.

ALTERNATIVE 4 – NO PROJECT ALTERNATIVE

DESCRIPTION

Under Alternative 4, the No Project Alternative, no cable line would be constructed between the Potrero and Hunters Point Switchyards. If the project were not implemented, direct impacts to the environment would not occur because no new construction would take place.

However, the No Project Alternative does not support necessary upgrades to the electrical transmission system serving the City required to meet necessary system reliability requirements and the goal of closing the Hunters Point Power Plant pursuant to PG&E's agreement with the City, as discussed in Section 1.2, would not be accomplished. The proposed project is considered necessary to ensure the reliability of service to San Francisco, to meet the local demand for electricity, and comply with CAISO planning standards and criteria.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because it would reduce or eliminate many of the environmental impacts, the No Project Alternative would be considered the environmentally superior alternative. However, the No Project Alternative would not fulfill the basic objectives of the proposed project. The objectives of the proposed project are to increase electrical reliability in San Francisco, comply with CAISO grid planning criteria, and facilitate the closure of the Hunters Point Power Plant.

The comparison between the proposed project and the three alternatives indicate that while they meet the project objectives, none are environmentally superior to the proposed project.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER CONSIDERATION

In addition to the alternatives discussed above, three additional alternatives were considered for analysis in this Initial Study; however, these alternatives were eliminated from further discussion. Two of the alternatives considered involved underground routes that would have traveled south on Illinois Street from the Potrero Switchyard and turned west on Cesar Chavez Street. Once on Cesar Chavez Street, they would have followed the Alternative 2 route. These two routes were eliminated from further consideration because the intersection of Illinois Street and Cesar Chavez Street is already highly congested with underground utilities. At that intersection, there are three sanitary lines as well as a gas line within close proximity. Additionally, the San Francisco Municipal Railway is constructing the Metro East Rail Maintenance Facility with feeder rails along 25th Street. At the Third Street crossing on Cesar Chavez Street, there are also a number of sanitary lines and storm drains, one of which is 54 inches wide and 36 inches deep. Boring in this area would not have been feasible. As a result, it would have been feasible for the cable line to turn at this intersection from Illinois Street to Cesar Chavez Street. A third option, a complete overhead transmission route, was considered but ultimately rejected due to the high density of urban development in the project area. In addition, the City expressed concern regarding the feasibility of this option as well as concerns regarding health and safety. Also, the potential concerns from local residents regarding potential increased exposure to Electromagnetic Fields (EMF) also made option less viable.

TABLE 3-1
COMPARISON OF IMPACTS AND IMPACT SIGNIFICANCE LEVELS OF THE PROPOSED PROJECT
AND THE ALTERNATIVES

Impact	PG&E's Preferred Alternative	Alternative 1: Islais Creek Alternative	Alternative 2: Cargo Way Alternative	Alternative 3: Islais Creek Overhead Cable Alternative	No Project Alternative
<i>Aesthetics</i>					
Substantial adverse effect on a scenic vista or other scenic resources.	N	=	=	=	=
Degrade the existing visual character of the site and surrounding area.	N	=	=	+	=
Create a new source of substantial light or glare.	LS	=	=	+(SU)	-
<i>Agricultural Resources</i>					
Convert farmland to non-agricultural uses.	N	=	=	=	=
Conflict with zoning for agricultural use or a Williamson Act contract.	N	=	=	=	=
Comparisons to Project					
+ Greater impact than that of the proposed project			LS	Less than significant adverse impact	
- Lesser impact than that of the proposed project			S/M	Significant (or Potentially Significant) prior to mitigation; however, mitigable to a less than significant level	
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Impact	PG&E's Preferred Alternative	Alternative 1: Islais Creek Alternative	Alternative 2: Cargo Way Alternative	Alternative 3: Islais Creek Overhead Cable Alternative	No Project Alternative
<i>Air Quality</i>					
Conflict with an air quality plan or violate any air quality standard.	LS	=	=	=	-
Result in a cumulatively considerable net increase of any criteria pollutant.	S/M	=	=	=	-
Expose sensitive receptors to substantial pollutant concentrations.	LS	=	=	=	-
Create objectionable odors.	N	=	=	=	=
<i>Biological Resources</i>					
Substantial adverse effect on candidate, sensitive, or special status species.	N	=	=	=	=
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Comparisons to Project					
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Impact	PG&E's Preferred Alternative	Alternative 1: Islais Creek Alternative	Alternative 2: Cargo Way Alternative	Alternative 3: Islais Creek Overhead Cable Alternative	No Project Alternative
Substantial adverse effect on any riparian habitat or other sensitive natural community.	N	=	=	=	=
Substantial adverse effect on federally protected wetlands.	N	=	=	=	=
Interfere with the movement of any native resident or migratory fish or wildlife species.	N	=	=	=	=
Conflict with any local policies or ordinances protecting biological resources.	N	=	=	=	=
Conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan.	N	=	=	=	=
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Cultural Resources					
Cause a substantial adverse change in the significance of a historical resource.	LS	=	=	=	-
Cause a substantial adverse change in the significance of an archaeological resource.	S/M	=	=	=	-
Destroy a unique paleontological resource or geologic feature.	S/M	=	=	=	-
Disturb any human remains.	S/M	=	=	=	-
Comparisons to Project					
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<i>Geology, Soils, and Seismicity</i>					
Expose people or structures to rupture of known earthquake fault.	LS	=	=	=	-
Expose people or structures to seismic-related ground shaking, ground failure, liquefaction, or landslides.	S/M	+/=	=	+/=	-
Result in soil erosion.	S/M	=	=	=	-
Located on a geologic unit or soil that is unstable.	S/M	=	=	=	-
Located on expansive soil.	S/M	=	=	=	-
Soils incapable of supporting	N	=	=	=	-
Comparisons to Project					
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<i>Hazards and Hazardous Materials</i>					
Routine transport, use, or disposal of hazardous materials.	S/M	=	=	=	-
Reasonably foreseeable upset and accident conditions involving release of hazardous materials.	S/M	=	=	=	-
Emit hazardous emissions or handle hazardous materials or wastes within ¼ mile of a school.	LS	=	=	=	-
Comparisons to Project					
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Located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	S/M	=	=	=	-
Located within an airport land use plan, or a public or private use airport.	LS	=	=	=	-
Interfere with the implementation of an emergency response or evacuation plan.	LS	=	=	=	-
Wildland fire hazards.	N	=	=	=	=

Comparisons to Project

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Hydrology and Water Quality					
Violate water quality standards or waste discharge requirements.	LS	=	=	=	-
Deplete groundwater supplies or interfere with groundwater recharge.	LS	=	=	=	-
Alter existing drainage pattern resulting in erosion or siltation.	N	=	=	=	=
Alter existing drainage pattern resulting in flooding, or exceeding capacity of stormwater drainage systems.	LS	=	=	=	-
Degrade water quality.	S/M	=	-	-	-
Comparisons to Project					
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Place housing within 100-year flood hazard, or expose people or structures to flooding as a result of the failure of a levee or dam.	N	=	=	=	=
Inundation by seiche, tsunami, or mudflow.	N	=	=	=	=
<i>Land Use, Plans, and Policies</i>					
Physically divide a community.	LS	=	=	=	-
Conflict with a land use plan, policy, or regulation.	LS	=	=	=	-
Conflict with a habitat conservation plan or natural community conservation plan.	N	=	=	=	=

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Mineral Resources					
Loss of availability of a known mineral resource.	LS	=	=	=	-
Loss of availability of a locally-important mineral resource.	N	=	=	=	=
Noise					
Expose people to or generation of noise levels and/or vibration in excess of established standards.	LS	=	=	=	-
Permanent increase in ambient noise levels.	N	=	=	=	=
Temporary or periodic increase in ambient noise levels.	S/M	-/=	=	-/=	-
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Located within an airport land use plan or within two miles of a public airport or private airstrip, and expose people residing or working in the project area to excessive noise levels.	N	=	=	=	=
Population and Housing					
Induce population growth.	LS	=	=	=	-
Displace existing housing.	S/M	=	=	=	-
Displace people.	S/M	=	=	=	-
Public Services					
Impacts to fire and police services.	LS	=	=	=	-
Impacts to schools	N	=	=	=	=
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Impacts to parks.	S/M	=	=	=	-
Impacts to other public facilities.	LS	=	+	=	-
<i>Recreation</i>					
Increase the use of existing parks or other recreational facilities.	LS	=	=	=	-
Require the construction or expansion of recreational facilities.	LS	=	=	=	-
<i>Transportation</i>					
Cause an increase in traffic.	S/M	=	=	=	-
Exceed an established level of service standard.	LS	=	=	=	-

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Result in a change in air traffic patterns.	N	=	=	=	=
Increase hazards due to a design feature.	S/M	=	=	=	-
Result in inadequate emergency access.	S/M	=	=	=	-
Result in inadequate parking capacity.	LS	=	=	=	-
Conflict with adopted alternative transportation policies, plans or programs.	LS	=	=	=	-
<i>Utilities and Services</i>					
Exceed wastewater treatment requirements.	LS	=	=	=	-

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=	Same (or similar) impact as that of the proposed project	S/U	Significant and unavoidable (or Potentially Significant and Unavoidable), even with mitigation
+/=	Approximately the same impact as or potentially greater impact than that of the proposed project	N	No Impact or negligible impact
-/=	Approximately the same impact as or potentially lesser impact than that of the proposed project		

a. Note: The comparisons in this table focus on the direct environmental impacts of the alternatives compared to the proposed project, due to the speculative nature of potential indirect impacts. A discussion of potential indirect environmental effects of the alternatives are discussed in the text in this chapter.

TABLE 3-1 (continued)
COMPARISON OF IMPACTS AND IMPACT SIGNIFICANCE LEVELS OF THE PROPOSED PROJECT AND THE ALTERNATIVES

Impact	PG&E's Preferred Alternative	Alternative 1: Islais Creek Alternative	Alternative 2: Cargo Way Alternative	Alternative 3: Islais Creek Overhead Cable Alternative	No Project Alternative
Require the construction of new water or wastewater treatment facilities, new storm water drainage facilities, or expansion of existing facilities.	N	=	=	=	-
Have sufficient water supplies to serve the project.	LS	=	=	=	-
Adequate wastewater treatment capacity to serve the project.	N	=	=	=	-
Sufficient landfill capacity to serve project, and compliance with regulations related to solid waste.	LS	=	=	=	-

Comparisons to Project

+	Greater impact than that of the proposed project	LS	Less than significant adverse impact
-	Lesser impact than that of the proposed project	S/M	Significant (or Potentially Significant) prior to mitigation; however, mitigable to a less than significant level
=	Same (or similar) impact as that of the proposed project	S/U	Significant and unavoidable (or Potentially Significant and Unavoidable), even with mitigation
+/=	Approximately the same impact as or potentially greater impact than that of the proposed project	N	No Impact or negligible impact
-/=	Approximately the same impact as or potentially lesser impact than that of the proposed project		

a. Note: The comparisons in this table focus on the direct environmental impacts of the alternatives compared to the proposed project, due to the speculative nature of potential indirect impacts. A discussion of potential indirect environmental effects of the alternatives are discussed in the text in this chapter.

